



Order Filed on June 16, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004

McMANIMON, SCOTLAND & BAUMANN, LLC

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Attorneys for Thomas J. Orr, Chapter 7 Trustee

In re:

CAROLYN E. BROWN,

Debtor.

Case No. 20-20921 (CMG)

Chapter 7

Honorable Christine M. Gravelle, U.S.B.J.

**CONSENT ORDER FOR THE TURNOVER OF FUNDS TO THE DEBTOR IN
SATISFACTION OF THE DEBTOR'S EXEMPTION UNDER 11 U.S.C. § 522(d)(1)
FROM THE PROCEEDS OF SALE OF THE DEBTOR'S REAL
PROPERTY LOCATED AT 11 OAK GLEN LANE, COLTS NECK, NJ**

The relief set forth on the following pages numbered two (2) through four (4) is hereby
ORDERED.

DATED: June 16, 2021

A handwritten signature in black ink, reading "Christine M. Gravelle".

Honorable Christine M. Gravelle
United States Bankruptcy Judge

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Debtor: Carolyn E. Brown
Case No. 20-20921 (CMG)
Caption of Order: Consent Order for the Turnover of Funds to the Debtor in Satisfaction of the Debtor's Exemption under 11 U.S.C. § 522(d)(1) from the Proceeds of Sale of the Debtor's Real Property Located at 11 Oak Glen Lane, Colts Neck, NJ

THIS MATTER, having been presented to the Court by Thomas J. Orr, the Chapter 7 Trustee (the “**Trustee**”) for Carolyn E. Brown, Chapter 7 debtor (“**Debtor**”), by and through his counsel, McManimon, Scotland & Baumann, LLC, on application for the entry of a Consent Order for the turnover of funds to the Debtor in satisfaction of the Debtor's exemption under 11 U.S.C. § 522(d)(1) in the real property located Oak Glen Lane, Colts Neck, NJ (the “**Property**”); and the Property having been sold by the Trustee, with net funds received in excess of the Debtor's allowed exemption of \$25,150 (the “**Homestead Exemption**”); and the Debtor having died prior to the sale of the Property; and the Trustee, Debtor's counsel and the executor of the Debtor's decedent estate having agreed to the manner of turnover of the funds to be paid on account of the Homestead Exemption, as appears from the signatures of counsel affixed hereto, it is hereby

ORDERED AS FOLLOWS:

1. The Trustee will pay the amount equal to the Homestead Exemption (\$25,150) by check payable and delivered to counsel for the Debtor's trust account. Upon receipt of this check by Debtor's counsel, the Debtor and the executor of the Debtor's decedent estate will be deemed to have waived any and all claims against the Trustee and/or the bankruptcy estate related to the payment of the Homestead Exemption.

2. The terms of this Consent Order are subject to the Court's approval and the issuance of a Notice of Settlement (the “**Notice**”) and the following:

- (a) If no objection to the Notice is filed, the issuance and docketing of a Certification of No Objection by the Clerk of the Bankruptcy Court; or

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(b) if any objection to the Notice is filed, the overruling of any such objection by this Court.

In the event that an objection to the settlement is filed and sustained, the parties shall be restored to their pre-settlement positions.

3. The parties, and anyone who succeeds to their rights and responsibilities hereunder, including their successors and/or assigns, are bound by this Consent Order. This Consent Order is made for the benefit of the parties and all who succeed to their rights and responsibilities.

4. The Bankruptcy Court will retain exclusive jurisdiction to adjudicate all matters arising under or in connection with this Consent Order.

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*The undersigned hereby consent to
the form and entry of the within Order:*

**MCMANIMON SCOTLAND
& BAUMANN, LLC**
Attorneys for Thomas J. Orr, Chapter 7 Trustee

COLLINS, VELLA & CASELLO, LLC
Attorneys for Carolyn E. Brown, the Debtor

By: /s/ Joseph R. Zapata, Jr.
JOSEPH R. ZAPATA, JR., ESQ.

By: /s/ Joseph M. Casello
JOSEPH M. CASELLO, ESQ.

Dated: June 7, 2021

Dated: June 3, 2021

**DECEDENT ESTATE
OF CAROLYN E. BROWN**

By: /s/ Douglas Brown
DOUGLAS BROWN, Executor

Dated: June 4, 2021